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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

10 ELISABETH LITCHFIELD, an individual,
11
12 Plaintiff,
13 v.
14 TARGET CORPORATION., and; DOES 1
15 through 100; and ROE CORPORATION 101
16 through 200, inclusive,
17 Defendant(s).

Case No.: 2:19-cv-01222-JAD-FJY

**STIPULATION AND ORDER
REGARDING RESPONSE TO
DEFENDANT'S MOTION FOR
SUMMARY JUDGMENT AND
ADDITIONAL DISCOVERY**

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19 Discovery on this matter closed on October 23, 2020. Prior to the close of
20 discovery, Plaintiff requested the 30(b)(6) deposition of defendant's representative.
21 However, due to scheduling conflicts and COVID related delays, the deposition has not
22 been able to be scheduled prior to the October 23, 2020 discovery deadline. The parties
23 have been diligently trying to schedule the deposition. The parties have agreed to allow the
24 deposition to take place after the close of discovery given the scheduling difficulties. The
25 parties have agreed that the requested deposition will proceed forward on December 17,
26 2020.

27 On November 24, 2020, Defendant filed a Motion for Summary Judgment, ECF
28 Document No. 26. The Plaintiff's response is due on December 14, 2020. Due to the delay

1 in obtaining dates for the Defendant's deposition, the parties stipulate and request the Court
2 to extend the deadline for Plaintiff's Response to Defendant's Motion for Summary
3 Judgment to January 6, ²⁰²¹ 20 days after the Defendant's deposition takes place.

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5 **BERNSTEIN & POISSON**

PERRY & WESTBROOK, P.C

6 **DATED: NOVEMBER 25, 2020**

DATED: NOVEMBER 25, 2020

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8 /s/ Amber N. King

/s/ Alan W. Westbrook

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14 **IT IS SO ORDERED:**

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17 RICHARD F. BOULWARE, II
United States District Judge

18 DATED this 30th day of November, 2020.
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